

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOSEPH MULL, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

GOTHAM DISTRIBUTING CORPORATION,
MVD ENTERTAINMENT GROUP, and OLD
SCHOOL VENTURES, INC., individually and
collectively d/b/a OLDIES.COM,

Defendants.

Case No. 2:24-cv-06083-GJP

JUDGE GERALD J. PAPPERT

**STIPULATION AND ORDER CONSOLIDATING AND EXTENDING BRIEFING
SCHEDULE ON DEFENDANT GOTHAM DISTRIBUTING CORPORATION'S
MOTION TO DISMISS**

WHEREAS, on November 13, 2024, Plaintiff Joseph Mull ("Plaintiff") commenced this putative class action;

WHEREAS, on March 20, 2025, Plaintiff moved for leave to file an amended complaint. (ECF No. 17);

WHEREAS, on May 2, 2025, the Court granted Plaintiff leave to file an amended complaint by May 8, 2025. (ECF No. 18);

WHEREAS, on May 5, 2025, Plaintiff filed a First Amended Complaint. (ECF No. 19);

WHEREAS, Defendant MVD Entertainment Group ("MVD") was served on May 7, 2025;

WHEREAS, on May 19, 2025, Defendant Old School Ventures, Inc. ("OSV") filed a motion to dismiss the First Amended Complaint. (ECF No. 21);

WHEREAS, Plaintiff's response to Defendant OSV's motion is due on June 2, 2025;

WHEREAS, on May 22, 2025, Defendant Gotham Distributing Corporation ("Gotham") filed a motion to dismiss the First Amended Complaint that incorporated all arguments made by Defendant OSV. (ECF No. 22);

WHEREAS, Plaintiff's response to Defendant Gotham's motion is due on June 5, 2025;

WHEREAS, Defendant MVD's answer or motion to dismiss was due on May 28, 2025;

WHEREAS, Plaintiff's response to any motion filed by Defendant MVD would be due on June 11, 2025;

WHEREAS, Plaintiff and Defendant Gotham have agreed to a 35-day extension of time for Plaintiff to file an omnibus response to all motions to dismiss, and a 7-day extension for Defendant Gotham to file its reply. Good cause exists for this extension because it conserves judicial resources by streamlining the responses and reduces the burden on the parties.

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel for the Parties, subject to the Court's approval, that:

1. Plaintiff shall respond to Defendant Gotham's motion to dismiss on or before July 9, 2025.
2. Defendant Gotham shall file its reply in support of its motion to dismiss on or before July 23, 2025.

Dated: May 29, 2025

Respectfully submitted,

/s/ Michael Conley (w/ permission)

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/s/ Elliot O. Jackson

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Counsel to Plaintiff

SO ORDERED, this 30th, day of May 2025.

/s/ Gerald J. Pappert

The Honorable Gerald J. Pappert
United States District Judge